

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

OSR ENTERPRISES AG, and OSR R&D ISRAEL LTD.,)	Civil Action No. 1:22-cv-01327-LY
Plaintiffs,)	
v.)	
REE AUTOMOTIVE LTD., REE AUTOMOTIVE HOLDING, INC., and REE AUTOMOTIVE USA INC.,)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO
PLAINTIFFS' COMPLAINT AND PROPOSED BRIEFING SCHEDULE FOR ANY
MOTION FILED ON THAT DATE**

Defendants REE Automotive Ltd., REE Automotive Holding, Inc., and REE Automotive USA Inc. (collectively, “Defendants”) and Plaintiffs OSR Enterprises AG, and OSR R&D Israel Ltd. (collectively, “Plaintiffs”) hereby jointly and respectfully move the Court to extend the time within which Defendants are required to move, answer, or otherwise respond to Plaintiffs’ Complaint; and to enter the proposed briefing schedule on any motion filed by Defendants on that date. In support of this Motion, the Parties state as follows:

1. Plaintiffs filed the Complaint in this case on December 16, 2022.
2. Defendants REE Automotive Holding, Inc. and REE Automotive USA Inc. were served with Plaintiffs’ Complaint on or about December 27, 2022, making their deadline to respond to Plaintiffs’ Complaint January 17, 2023, which deadline has not passed. Defendant REE Automotive Ltd. was served via The Hague Convention on or about January 10, 2023, making its deadline to respond to Plaintiffs’ Complaint January 31, 2023, which deadline also has not passed.

3. Defendants have requested, and Plaintiffs do not oppose, an extension of time up to and including March 17, 2023 for each of them to move, answer, or otherwise respond to Plaintiffs' Complaint. This deadline is calculated as 45 days from REE Automotive Ltd.'s current deadline of January 31, 2023.

4. In order to accommodate Defendants' request, Plaintiffs have requested, and Defendants do not oppose, a modified briefing schedule on any motion Defendants may file in response to Plaintiffs' Complaint.

5. As part of the Parties' agreement, Defendants have agreed to waive any objections to service of process, but preserved all other defenses and objections, including as to personal jurisdiction.

6. Accordingly, the Parties have met and conferred and propose the following schedule for Defendants to answer or otherwise respond to Plaintiffs' Complaint and for briefing on any motion filed by Defendants in response to Plaintiffs' Complaint:

- **March 17, 2023** – Last day for REE Automotive Ltd., REE Automotive Holding, Inc., and REE Automotive USA Inc. to answer or otherwise respond to Plaintiffs' Complaint;
- **April 28, 2023** – Last day for Plaintiffs to respond to any motion filed by REE Automotive Ltd., REE Automotive Holding, Inc., and/or REE Automotive USA Inc. in response to Plaintiffs' Complaint;
- **May 19, 2023** – Last day for REE Automotive Ltd., REE Automotive Holding, Inc., and REE Automotive USA Inc. to reply to any response filed by Plaintiffs.

7. The undersigned's appearance in this lawsuit on behalf of Defendants is entered solely for purposes of filing the present motion and eventual response to Plaintiffs' Complaint, and is expressly not a waiver of any response or defense thereto, including any motion to dismiss for lack of personal jurisdiction, except as to service of process.

WHEREFORE, Defendants and Plaintiffs respectfully request that the Court extend Defendants' time to move, answer, or otherwise respond to Plaintiffs' Complaint to and including March 17, 2023 and enter the proposed briefing schedule for any motion filed by Defendants on that date. A proposed Order accompanies the Motion.

Dated: January 13, 2023

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2023 a copy of the foregoing document was filed with the Court through the ECF system and that a copy will be electronically served on registered participants as identified on the Notice of Electronic Filing.

By: */s/Brantley A. Smith*
Brantley A. Smith